

The Honorable Mary Jo Heston
Chapter 13
Hearing Date: September 3, 2020
Hearing Time: 9:00 AM
Hearing Location: Telephonic
Response Due: August 27, 2020

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT TACOMA

IN RE:

BK Case No.: 19-42890-MJH

SARAH HOOVER,

Adv No. 20-04002 – MJH

Debtor.

Chapter: 13

SARAH HOOVER,

Plaintiff,

DECLARATION OF CHRISTINA L HENRY
IN SUPPORT OF PLAINTIFF'S COMBINED
OPPOSITION TO MOTIONS FOR
SUMMARY JUDGMENT BY
DEFENDANTS' PHH MORTGAGE
CORPORATION, HSBC BANK, AND
NEWREZ, LLC, AND IH6 PROPERTY

v.

QUALITY LOAN SERVICE CORPORATION
OF WASHINGTON, PHH MORTGAGE
CORPORATION D/B/A PHH MORTGAGE
SERVICES, HSBC BANK USA, N.A, AS
TRUSTEE OF THE FIELDSTONE
MORTGAGE INVESTMENT TRUST,
SERIES 2006-2, NEW REZ, LLC, AND IH6
PROPERTY WASHINGTON, L.P. D/B/A
INVITATION HOMES,

Defendant.

I, Christina L Henry, hereby declare as follows:

1. I am a Plaintiff in the above-referenced adversary proceeding and I have personal knowledge concerning all information in this declaration.

2. Attached hereto as Exhibit A is a true and correct copy of the deposition of Sony Prudent, the Rule 30(b)(6) deponent for PHH Mortgage Corporation dba PHH Mortgage

Services, taken on August 12, 2020 for this case. Additionally, exhibits testified to at that deposition are attached here as follows:

Prudent Exhibit 3 (Excerpt of pgs 1-28)

Prudent Exhibit 4 (Excerpt)

Prudent Exhibit 6

Prudent Exhibit 10

Prudent Exhibit 13

Prudent Exhibit 15

Prudent Exhibit 16

3. Attached hereto are true and correct copies of the letters I sent to the parties in this lawsuit, putting them on notice of the violation of the automatic stay. Those letters are attached hereto as follows:

Exhibit B

Exhibit C

Exhibit D

Exhibit E

4. Attached hereto as Exhibit F are true and correct copies of the emails I sent to the parties in this lawsuit, putting them on notice of the violation of the automatic stay.

5. Attached hereto as Exhibit G is a true and correct copy of excerpts of QLS's Discovery Responses to Plaintiff. Additionally, relevant excerpts of document production are attached hereto as follows:

QLS Exhibit 1 [Excerpts of Document Production]

6. Attached hereto as Exhibit H is a true and correct copy of excerpts of IH6's Discovery Responses to Plaintiff. Additionally, relevant document production is attached hereto as follows:

IH6 Exhibit 1 – [Excerpts of Document Production]

1 7. Attached hereto as Exhibit I is a true and correct copy excepts of the Statutes of
2 the Territory of Washington from the Legislative Session of February 27th, 1954 that I accessed
3 on the webpage, <https://leg.wa.gov/CodeReviser/documents/sessionlaw/1854pam1.pdf>, at
4 November 13, 2020 at 3:33pm.

5 8. Attached hereto as Exhibit J is a true and copy of the amount of funds deposited
6 into my trust account monthly for Sarah Hoover since February 2020 of this year.

7 9. Attached hereto as Exhibit K correct copy of excerpts from the deposition of
8 Michael Lappano, the Rule 30(b)(6) deponent for IH6 Property Washington (“IH6”), taken on
9 July 15, 2020 for this case.

10 10. Attached hereto as Exhibit L are true and correct copy of excerpts from the
11 deposition of Jeff Stenman, the Rule 30(b)(6) deponent for Quality Loan Service Corporation of
12 Washington (“QLS”), taken on July 7, 2020 for this case. Additionally, relevant exhibits testified
13 to at that deposition are attached here as follows:

14 Stenman Exhibit 3

15 I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE
16 OF WASHINGTON AND THE UNITED STATES THAT THE ABOVE IS TRUE
17 AND CORRECT.

18 Executed at Bothell, WA this November 13, 2020

19 /s/ Christina L Henry
20 Christina L Henry, WSBA# 31273